

Motion for Leave to Conduct Jurisdictional Discovery [ECF No. 51] (hereinafter “*Plaintiffs’ Response*”), and to respond to *Plaintiffs’ Motion for Leave to Conduct Jurisdictional and Venue Discovery* [ECF No. 50] (hereinafter “*Plaintiffs’ Motion*”).

Under the prior stipulated extensions granted by this Court, Defendants’ reply to *Plaintiffs’ Response* must be filed by June 12, 2023. [ECF No. 45]. Per the Local Rules, Defendants’ response to *Plaintiffs’ Motion* must be filed by June 19, 2023 (14 days from June 5). U.S.D.C.L.R. 7.1(b)(1)(B).

Given the interconnection and complexity of issues raised in both *Plaintiffs’ Response* and *Plaintiffs’ Motion*, as well as Defendants’ counsels’ scheduling demands (which include a one-week arbitration beginning June 12, 2023 for Mr. Smith), Defendants request that the Court extend both the reply and response deadlines to June 26, 2023. This would result in a 14-day extension for the reply and a 7-day extension for the response. Defendants do not believe these extensions would impact any other matters before the Court in this case.

CERTIFICATE OF CONFERRAL

Defense counsel has conferred with Plaintiffs’ counsel and Plaintiffs have agreed to stipulate to the requested extensions.

Dated this 8th day of June, 2023.

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of June, 2023, I electronically transmitted the foregoing document using the CM/ECF system which will send notification to all ECF Registrants in this action.

/s/ Holly L. Tysse
OF CROWLEY FLECK PLLP